

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE ELEVENTH CIRCUIT**

Case No. 22-11150-GG  
L.T. Case No. 9:18-cv-80176-BB

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IRA KLEIMAN, as the Personal Representative of the Estate of David Kleiman,  
*plaintiff-appellant,*

v.

CRAIG WRIGHT,  
*defendant-appellee.*

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**NOTICE OF SUPPLEMENTAL AUTHORITY**

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Andrés Rivero  
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Counsel for appellee

**CERTIFICATE OF INTERESTED PERSONS  
AND CORPORATE DISCLOSURE STATEMENT**

Pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure and Eleventh Circuit Rule 26.1, Appellee Dr. Craig Wright (“Dr. Wright”), respectfully submits the following Certificate of Interested Persons<sup>1</sup> and Corporate Disclosure Statement:

1. The Honorable Judge Beth Bloom, *U.S. District Judge*
2. Boies Schiller Flexner LLP, *Counsel for Plaintiff-Appellant*
3. Brenner, Andrew, *Counsel for Plaintiff-Appellant*
4. BTCN 1610-491 LLC (CE)
5. Delich, Joseph, *Counsel for Plaintiff-Appellant*
6. Devine Goodman & Rasco, LLP, *Counsel for non-party Andrew O’Hagan*
7. Economides, Constantine Philip *Counsel for Plaintiff-Appellant*
8. Estate of David Kleiman, *Plaintiff-Appellant*
9. Fernandez, Amanda Lara, *Counsel for Defendant-Appellee*
10. Fernandez, Michael Alexander, *Counsel for Defendant-Appellee*
11. Freedman, Velvel, *Counsel for Plaintiff-Appellant*
12. Glaser, Patricia, *Counsel for non-party John Doe*
13. Glaser Weil Fink Howard Avchen & Shapiro LLP, *Counsel for nonparty*

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<sup>1</sup> Based on the facts set forth in appellee’s Motion to Disqualify, Ava Labs and Emin Gün Sirer appear to be interested persons.

*John Doe*

14. Harrison, Laselve, *Counsel for Plaintiff-Appellant*
15. Henry, Allison, *Counsel for Defendant-Appellee*
16. \*Holtzman, Alexander, *Counsel for Plaintiff-Appellant*
17. Kass, Zalman, *Counsel for Defendant-Appellee*
18. Kleiman, Ira, *Plaintiff-Appellant*
19. Kuntz, Robert, *Counsel for Defendant-Appellee*
20. Lagos, Stephen, *Counsel for Plaintiff-Appellant*
21. Licata, Samantha, *Counsel for Plaintiff-Appellant*
22. \*Lohr, Whitney, *Counsel for Defendant-Appellee*
23. \*Markoe, Zaharah, *Counsel for Defendant-Appellee*
24. McGovern, Amanda *Counsel for Defendant-Appellee*
25. Mestre, Jorge, *Counsel for Defendant-Appellee*
26. Payne, Darrell Winston, *Counsel for non-party John Doe*
27. Pritt, Maxwell, *Counsel for Plaintiff-Appellant*
28. Rasco, Guy Austin, *Counsel for non-party Andrew O'Hagan*
29. The Honorable Judge Bruce Reinhart, *U.S. District Magistrate Judge*
30. Rivero, Andres, *Counsel for Defendant-Appellee*
31. Rivero Mestre LLP, *Counsel for Defendant-Appellee*
32. Roche Freedman LLP, *Counsel for Plaintiff-Appellant*

33. Roche, Kyle, *Counsel for Plaintiff-Appellant*

34. Rolnick, Alan, *Counsel for Defendant-Appellee*

35. Stearns Weaver Miller Weissler Alhadeff & Sitterson, P.A., *Counsel for non-party John Doe*

36. Wright, Craig, *Defendant-Appellee*

37. Zack, Stephen, *Counsel for Plaintiff-Appellant*

\* = no longer involved in representation

Appellee certifies that he knows of no other judges, attorneys, persons, associations of persons, firms, partnerships, or corporations have an interest in the outcome of this appeal.

**NOTICE OF SUPPLEMENTAL AUTHORITY**

Appellee Dr. Craig Wright respectfully submits this Notice of Supplemental Authority in support of his Motion to Disqualify Appellant's counsel. On October 14, 2022, District Judge Katherine Polk Failla entered a paperless order (the "Order"), following a hearing on October 13, 2022 in *In re Tether and Bitfinex Crypto Asset Litigation*, Case Number: 1:19-cv-09236-KPF (S.D.N.Y.). The Order removes Roche Freedman as class counsel on grounds similar to those set forth in Dr. Wright's pending Motion to Disqualify filed on September 6, 2022. A copy of the Order and the transcript of the October 13, 2022 hearing are attached as Composite **Exhibit A**.

Date: October 17, 2022.

Respectfully submitted,

By: s/ Andrés Rivero  
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**CERTIFICATE OF COMPLIANCE**

This motion complies with the type-volume limitation of Fed. R. App. P. 27(d)(2)(A) because it contains 106 words. This motion also complies with typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. P. 32(a)(6) because this motion has been prepared in a proportionally spaced typeface using Microsoft Word Office Version 2013 and 14-point Times New Roman type style.

/s/ Andrés Rivero

**CERTIFICATE OF SERVICE**

I CERTIFY that on October 17, 2022, I electronically filed this document with the Clerk of the Court using CM/ECF. I also certify that this document is being served this day on all counsel of record by transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Andrés Rivero